

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2010 covering the prior calendar year January 1, 2010 through December 31, 2010.

Date filed: March 1, 2011

Name of company(s) covered by this certification: Telesphere Networks Ltd.

Form 499 Filer ID: 825993

Name of signatory: Sanjay Srinivasan

Title of signatory: Chief Technology Officer

I, Sanjay Srinivasan, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 8 of the U.S. Code and may be subject to enforcement action.

Signed



Dated

2/25/2011

Sanjay Srinivasan, Chief Technology Officer

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Attachment 1: Statement Concerning Company Procedures

General duty, training, and discipline.

Telesphere Networks, Ltd. (the “Company”) has adopted and distributed to all employees a confidentiality policy that addresses proper handling and use of CPNI and advises all employees of their duty to safeguard CPNI. Employees are advised that violations of the confidentiality policy will subject an employee to disciplinary action, up to and including immediate termination of employment. The Company makes CPNI available to employees only on a need-to-know basis.

Use of customer proprietary network information without customer approval (47 C.F.R. § 64.2005); Approval required for use of customer proprietary network information (47 C.F.R. § 64.2007); Notice required for use of customer proprietary network information (47 C.F.R. § 64.2008); Safeguards required for use of customer proprietary network information (47 C.F.R. § 64.2009)

The Company has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations. The Company does not disclose CPNI to third parties or permit third parties to access or use CPNI except as permitted by 47 U.S.C. § 222 or as otherwise permitted by law.

Safeguards on the disclosure of customer proprietary network information (47 C.F.R. § 64.2010)

The Company does not provide any telephone or in-store access to call detail information. The Company has instituted on-line authentication procedures and on-line change notification procedures.

The Company notifies customers immediately by email to the customer’s email address of record or by voicemail to the telephone number of record of any changes to customer account information. This notice does not reveal the changed information and is sent to the existing address or telephone number of record, not to an address or telephone number that has been changed. Online account change notification procedures have been implemented as part of the online authentication process.

Notification of customer proprietary information security breaches (47 C.F.R. § 64.2011)

The Company’s operating procedures require notification of relevant law enforcement agencies and customers in accordance with FCC rules in the event of a breach of CPNI. The Company maintains records of any breaches discovered, notifications made to law enforcement, and notifications made to customers. These records include, where available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach. The Company retains these records for two years.